## **BakerHostetler**

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## VIA ECF

March 11, 2021

The Honorable Katherine H. Parker, U.S.M.J.
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States
Courthouse
500 Pearl Street, Room 750
New York, New York 10007-1312

APPLICATION GRANTED: The telephonic Status Conference in this matter that is scheduled for Tuesday, March 16, 2021 at 11:45 a.m. is hereby rescheduled to Tuesday, April 20, 2021 at 12:45 p.m. Counsel is directed to call Judge Parker's teleconference line at the scheduled time. Please dial (866) 434-5269, Access code: 4858267

APPLICATION GRANTED

Kathany H Nale

Hon. Katharine H. Parker, U.S.M.J.

03/11/2021

Re: Tang v. Guo, et al. (No. 1:17-cv-9031 (JFK) (KHP))

Dear Magistrate Judge Parker:

This firm represents defendants Wengui Guo, Golden Spring (New York) Ltd., and Saraca Media Group, Inc. in the above-referenced matter. This letter is submitted jointly with all parties to update the Court on the status of discovery in advance of the telephonic status conference currently scheduled for March 16, 2021 at 11:45 am and to request an adjournment of that status conference.

The parties have agreed to a 30-day mutual extension to April 6, 2021 to serve responses and objections to the first sets of discovery requests, which were due to be served on March 8, 2021. As no discovery has been exchanged and responses and objections have not yet been served—and with plaintiff Tang due to notify the Court whether he intends to participate in this action by March 31, 2021—the parties respectfully request that the telephonic status conference be adjourned to a time convenient to the Court on or after April 13, 2021.

We appreciate Your Honor's attention to this matter.

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Respectfully submitted,

s/Peter B. Shapiro

Peter B. Shapiro

cc: all parties via ECF